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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,

Case No. 13-cv-05878 EMC

Plaintiffs,

**JOINT STIPULATION REGARDING
SCHEDULE FOR J.H. DEPOSITION
DESIGNATIONS; [PROPOSED]
ORDER**

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

1 The parties respectfully submit this joint stipulation and proposed order concerning the
 2 deadlines for the deposition designations for J.H., a member of the Plaintiff class who was
 3 recently deported to the Philippines and is expected to be unavailable for trial. On March 17,
 4 2016, the Court granted Plaintiffs' emergency request to depose J.H. to preserve his testimony,
 5 given his then-impending deportation. *See* ECF No. 165; ECF No. 164. Pursuant to the Court's
 6 order, the deposition of J.H. occurred on March 23, 2016, with questioning by counsel for both
 7 Plaintiffs and Defendants. Plaintiffs requested expedited delivery of J.H.'s transcript, which was
 8 delivered to all parties on March 29, 2016. Plaintiffs will submit J.H.'s deposition errata by no
 9 later than April 4, 2016.

10 The trial in this case is schedule to begin on May 23, 2016 and the Final Pretrial
 11 Conference is scheduled for April 19, 2016. *See* ECF No. 96 (scheduling order); ECF No. 107
 12 (rescheduling Final Pretrial Conference to April 19, 2016). The Court's recent modification of
 13 pretrial deadlines requires the joint pretrial conference statement to be filed by the Parties by
 14 April 7, 2016. *See* No. 174. The Parties seek a slight modification of the pretrial deadlines with
 15 respect to deposition designations for J.H., specifically:

16 April 8, 2016 – Parties to exchange deposition designations

17 April 13, 2016 – Parties to exchange any objections and counter-designations

18 April 15, 2016 – Parties to exchange responses to objections to designations and any
 19 objections to counter-designations

20 April 18, 2016 – Plaintiffs to file the designations and objections
 21 (by 9:00 a.m.)

22
 23 Dated: April 1, 2016

By: /s/ Angélica Salceda
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1 Dated: April 1, 2016

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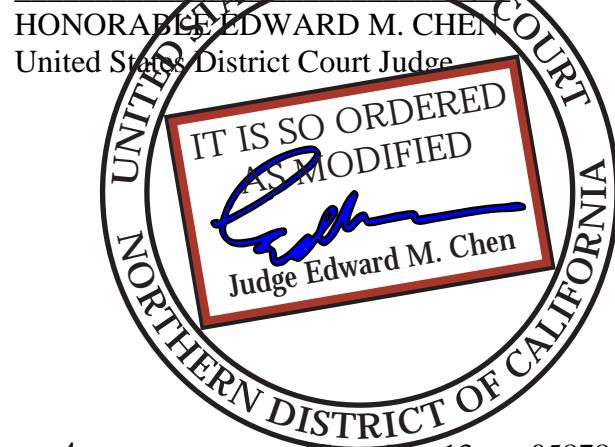
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18 **[PROPOSED] ORDER**

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED. (with modification on page 2 line
21 21).

22 Date: 4/4/16



1 **ATTESTATION OF CONCURRENCE IN JOINT FILING**

2 **Pursuant to Local Rule 5-1(i)(3)**

3 I, Angélica H. Salceda, hereby attest that the other signatories listed here have concurred
4 in the filing of this document.

5 Dated: April 1, 2016

6 _____
/s/ Angélica H. Salceda

7 ANGÉLICA H. SALCEDA

10 **CERTIFICATE OF SERVICE**

11 No: 3:13-cv-05878 EMC

12 I hereby certify that on April 1, 2016, a true and correct copy of the foregoing
13 **Joint Stipulation Regarding Schedule for J.H. Deposition Designations** was served with the
14 Clerk of the Court by using the CM/ECF system, which provided an electronic notice and
15 electronic link of the same to all attorneys of record through the Court's CM'ECF system.

17 Dated: April 1, 2016

18 _____
/s/ Angélica H. Salceda

19 ANGÉLICA H. SALCEDA